

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DJAVANSHIR D.GADJIEV,	:	
	:	
Plaintiff,	:	CIVIL FILE
	:	
vs.	:	ACTION NO. 1:12-CV-2700-JEC
	:	
ATLANTA INDEPENDENT	:	
SCHOOL SYSTEM, STEPHANIE A.	:	
BAILEY, in her individual capacity	:	
and THOMAS W. GLANTON, in his	:	
individual capacity,	:	
	:	
Defendants.	:	
	:	

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**PLAINTIFF’S COUNSEL REQUEST FOR WITHDRAWAL**

Counsel for Plaintiff Djavanshir D. Gadjiev files his Request for Withdrawal pursuant to LR 83.1E. NDGa and states the following:

1.

Plaintiff’s Counsel is requesting withdrawal as attorney of record from the above-styled action. The name of the Clerk of this Court is James N. Hatten, Richard B. Russell Federal Building and Courthouse, 75 Spring Street S.W., Atlanta, Georgia 30303-3361. The name of opposing Defendants’ counsel is Michael James Walker, Esq., Carlock, Copeland & Stair, LLP, 191 Peachtree Tower, 191 Peachtree Street

N.E., Suite 3600, Atlanta, Georgia 30303.

2.

This withdrawal of counsel is filed in accordance with LR 83.1E. NDGa. and the Georgia Rules of Professional Conduct.

3.

Plaintiff's counsel has given Plaintiff Djavanshir D. Gadjiev fourteen (14) days prior written notice and email notice of his intention to request permission to withdraw.

4.

This Court retains jurisdiction of this action.

5.

Plaintiff Djavanshir D. Gadjiev has the burden of keeping the Court informed respecting where notices, pleadings or other papers may be served.

6.

Plaintiff Djavanshir D. Gadjiev has a burden to prepare for discovery, motions, or trial or hire other counsel to prepare for discovery, motions, or trial when the court date has been set.

7.

If Plaintiff Djavanshir D. Gadjiev fails or refuses to meet these burdens, he

may suffer adverse consequences in this action including dismissal of the action for failure to prosecute, default judgment or other action that will result is the dismissal of this action.

8.

There are no hearing dates, filing deadlines, or motions that have been filed or are pending in this action. The Court ruled upon Defendant's Motion to Dismiss and the discovery period is just beginning in this action. Upon information and belief, Plaintiff Djavanshir D. Gadjiev will not be affected by withdrawal of counsel.

9.

The service of this notice is made upon Plaintiff Djavanshir D. Gadjiev, whose last known address is 255 Manor Blvd., Apt. 2012, Naples, Florida 34104 and upon his email address at [dgadjiev2@gmail.com](mailto:dgadjiev2@gmail.com).

8.

Plaintiff Djavanshir D. Gadjiev has the right to object within 14 days of this notice. A copy of this notice is attached to this motion.

This 7th day of October, 2013.

BY: /s/ Torin D. Togut

Torin D. Togut

Georgia Bar No. 713950

Attorney for Plaintiff

140 Hanarry Drive  
Lawrenceville, Georgia 30046  
(678) 372-1829  
(678) 407-2449 (FAX)  
torin@togutlaw.com

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	:	
Defendants.	:	
	:	
	:	

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**COUNSEL FOR PLAINTIFF WRITTEN NOTICE CERTIFICATE**

Counsel for Plaintiff has complied with the requirements for withdrawal as attorney of record for Plaintiff as set forth in LR 83.1E. NDGa. Counsel for Plaintiff has attached the required written notice that is being served Plaintiff Djavanshir D. Gadjiev in this action at 255 Manor Blvd., Apt. 2012, Naples, Florida 34104 and upon his email address at [dgadjiev2@gmail.com](mailto:dgadjiev2@gmail.com).

Unless the withdrawal is with Plaintiff Djavanshir D. Gadjiev's consent, he has the right to object within fourteen (14) days of this notice.

This \_\_\_\_\_ day of October, 2013.

BY: /s/ Torin D. Togut  
Torin D. Togut  
Georgia Bar No. 713950  
Attorney for Plaintiff

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Lawrenceville, Georgia 30046  
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	:	
Defendants.	:	
	:	

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**CERTIFICATE OF SERVICE**

I hereby certify that on the electronically filed Plaintiff's Counsel Request for Withdrawal and Written Notification Certificate Initial Disclosures with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to following attorney of record:

Michael James Walker  
[mwalker@carlockcopeland.com](mailto:mwalker@carlockcopeland.com)

I hereby certify that I have mailed by United States Postal Service the documents to the following non-CM/ECF participants: Plaintiff Djavanshir D. Gadjiev, 255 Manor Blvd., Apt. 2012, Naples, Florida 34104

BY: /s/ Torin D. Togut

Torin D. Togut

Georgia Bar No. 713950

Attorney for Plaintiff

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Lawrenceville, Georgia 30046  
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